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**SUPPLEMENTAL LETTER TO**  
**LETTER MOTION FOR SANCTIONS UNDER FRCP 37(b) & (c)**

March 19, 2017

Honorable Steven L. Tiscione  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:**    ***Benjamin Cruz v. City of New York, et al., 16-cv-603 (FB) (ST)***

Dear Judge Tiscione:

I write to update Plaintiff's pending motion for sanctions, dated March 13, 2017, with the following new information not previously available.

On March 15, 2017, shortly after 1:00 p.m., some additional "unredacted" documents were personally delivered to me at my office by Defendants' counsel's office. Also on the afternoon of March 15<sup>th</sup>, I received the original of the transcript of Plaintiff's February 13<sup>th</sup> deposition which had been hand delivered to my office by Defendants' counsel's office.

Thank you very much for Your Honor's time and consideration.

Respectfully submitted,

/s/

Judith E. Stein (JS4531)  
Attorney for Plaintiff Benjamin Cruz